

Bates number	Date	Author	To	Copied	Privilege Description	Reason
LCI PRIV 00642 – LCI PRIV 00644	7/27/95	Sidney R. Bluming	Rosemary Welk	Greg LeMond	Confidential fax communication from attorney to client and client's representative for the purpose of providing legal advice regarding negotiations with Trek	AC/WP
LCI PRIV 00645	7/27/95	Rosemary Welk	Sidney D. Bluming		Confidential communication from client's representative to attorney for the purpose of obtaining legal advice regarding negotiations with Trek	AC/WP
LCI PRIV 00646 – LCI PRIV 00652	7/27/95	Sidney D. Bluming	Rosemary Welk		Confidential fax communication from attorney to client's representative for the purpose of providing legal advice regarding negotiations with Trek	AC/WP
LCI PRIV 00653	7/27/95	Rosemary Welk	Sidney R. Bluming		Confidential fax communication from client's representative to attorney for the purpose of obtaining legal advice regarding negotiations with Trek	AC/WP
LCI PRIV 00654 – LCI PRIV 00655	7/25/95	Greg LeMond	Sidney R. Bluming		Confidential fax communication from attorney to client for the purpose of rendering legal advice regarding negotiations with Trek	AC/WP
LCI PRIV 00656 – LCI PRIV 00658	7/25/95	Sidney R. Bluming	Rosemary Welk	Greg LeMond	Confidential fax communication from attorney to client and client's representative for the purpose of obtaining legal advice regarding negotiations with Trek	AC/WP
LCI PRIV 00659 – LCI PRIV 00660	7/24/95	Sidney D. Bluming	Greg LeMond		Confidential fax communication from attorney to client for the purpose of providing legal advice regarding negotiations with Trek	AC/WP
LCI PRIV 00661	7/24/95	Rosemary Welk	Sidney D. Bluming		Confidential fax communication from attorney to client's representative for the purpose of providing legal advice regarding Renegade inventory and negotiations with Trek	AC/WP
LCI PRIV 00662 – LCI PRIV 00664	7/24/95	Sidney D. Bluming	Rosemary Welk		Confidential fax communication from attorney to client's representative for the purpose of providing legal advice regarding Renegade inventory and negotiations with Trek	AC/WP
LCI PRIV 00665 – LCI PRIV 00667	7/20/95	Sidney D. Bluming	Rosemary Welk		Confidential fax communication from attorney to client's representative for the purpose of providing legal advice regarding Renegade inventory and negotiations with Trek	AC/WP
LCI PRIV 00668	7/14/95	Andy Gallo	Sidney D. Bluming		Confidential e-mail communication within legal department regarding Renegade inventory and negotiations with Trek	WP

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LCI PRIV 00669 – LCI PRIV 00673	7/10/95	Sidney D. Bluming	Greg LeMond		Confidential letter communication from attorney to client for the purpose of providing legal advice regarding negotiations with Trek	AC/WP
LCI PRIV 00674 – LCI PRIV 00675	6/21/95	Rosemary Welk	Sidney D. Bluming		Confidential letter communication from client's representative to attorney for the purpose of obtaining legal advice regarding contracts with Finish Line Sportswear, Sinclair Imports, and Clark Kent	AC/WP
LCI PRIV 00676 – LCI PRIV 00677	6/6/95	Sidney D. Bluming	Greg LeMond		Confidential fax communication from attorney to client for the purpose of providing legal advice regarding negotiations with Trek	AC/WP
LCI PRIV 00678 – LCI PRIV 00679	5/23/95	Sidney D. Bluming	Greg LeMond		Confidential fax communication from attorney to client for the purpose of providing legal advice regarding negotiations with Trek	AC/WP
LCI PRIV 00680 – LCI PRIV 00681	5/23/95	Sidney D. Bluming	Greg LeMond		Confidential fax communication from attorney to client for the purpose of providing legal advice regarding negotiations with Trek	AC/WP
LCI PRIV 00682 – LCI PRIV 00686	5/23/95	Sidney D. Bluming	Greg LeMond		Confidential fax communication from attorney to client for the purpose of providing legal advice regarding negotiations with Trek	AC/WP
LCI PRIV 00687 – LCI PRIV 00690	5/22/95	Sidney D. Bluming	Greg LeMond		Confidential fax communication from attorney to client for the purpose of providing legal advice regarding negotiations with Trek	AC/WP
LCI PRIV 00691 – LCI PRIV 00695	5/8/95	Sidney D. Bluming	Greg LeMond		Confidential fax communication from attorney to client for the purpose of providing legal advice regarding negotiations with Trek	AC/WP
LCI PRIV 00696	5/8/95	Sidney D. Bluming	Greg LeMond		Confidential fax communication from attorney to client for the purpose of providing legal advice regarding negotiations with Trek	AC/WP
LCI PRIV 00697 – LCI PRIV 00702	1/22/98	Sidney D. Bluming	Greg LeMond Mary Haigh		Confidential fax communication from attorney to client and client's representative for the purpose of providing legal advice regarding Austrian trademark	AC/WP
LCI PRIV 00703 – LCI PRIV 00704	10/9/03	Sidney D. Bluming	Mary Haigh		Confidential letter communication from attorney to client's representative for the purpose of providing legal advice regarding Trek certificate of insurance	AC/WP
LCI PRIV 00705 – LCI PRIV 00707	1/9/03	Daun Yearwood	Mary Haigh Greg LeMond		Confidential fax communication from attorney to client and client's representative for the purpose of providing legal advice regarding Trek certificate of insurance	AC/WP
LCI PRIV 00708 – LCI PRIV 00723	11/28/01	Sidney R. Bluming	Greg LeMond Warren Gibson		Confidential fax communication from attorney to client for the purpose of rendering legal advice regarding Trek – Saturn team	AC/WP

Bates number	Date	Author	To	Copied	Privilege Description	Reason
LCI PRIV 00724	11/21/02	Sidney D. Bluming	Greg LeMond		Confidential fax communication from attorney to client for the purpose of providing legal advice regarding Litscher v. Trek, LeMond et al. suit	AC/WP
LCI PRIV 00725 – LCI PRIV 00727	12/9/02	Sidney D. Bluming	Greg LeMond	Warren Gibson	Confidential fax communication from attorney to client and client's agent for the purpose of providing legal advice regarding Trek certificate of insurance	AC/WP
LCI PRIV 00728 – LCI PRIV 00730	12/10/01	Jill Scarcia	Greg LeMond Warren Gibson		Confidential letter communication from attorney to client and client's agent for the purpose of providing legal advice regarding Sponsorship Agreement between Trek and Team Sports	AC/WP
LCI PRIV 00731 – LCI PRIV 00733	7/21/04	Sidney R. Bluming			Confidential attorney notes reflecting attorney's thoughts, mental impressions, legal opinions and legal advice regarding identification of potential witnesses	WP
LCI PRIV 00734 – LCI PRIV 00737	7/28/04	Sidney R. Bluming			Confidential attorney notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek	WP
LCI PRIV 00738	8/4/04	Sidney R. Bluming	Greg LeMond	Warren Gibson	Confidential e-mail communication from attorney to client and client's agent for the purpose of rendering legal advice regarding negotiations with Trek	AC/WP
LCI PRIV 00739	8/9/04	Greg LeMond	Sidney R. Bluming		Confidential e-mail communication from client to attorney for the purpose of obtaining legal advice regarding communication with Trek	AC/WP
LCI PRIV 00740	8/8/04	Greg LeMond	Sidney R. Bluming		Confidential e-mail communication from client to attorney for the purpose of obtaining legal advice regarding negotiations with Trek	AC/WP
LCI PRIV 00741 – LCI PRIV 00742	8/2004	Sidney R. Bluming			Confidential memorandum containing attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek	WP
LCI PRIV 00743 – LCI PRIV 00747	8/24/04	Sidney R. Bluming	Martin R. Lueck Christopher W. Madel Greg LeMond		Confidential fax communication between attorneys with copy to client for the purpose of rendering legal advice regarding communication with Trek about Trek's notice of breach	AC/WP

Bates number	Date	Author	To	Copied	Privilege Description	Reason
LCI PRIV 00748	8/11/04	Sidney R. Bluming			Confidential attorney notes containing attorney's thoughts and mental impressions for the purpose of providing legal advice regarding negotiations with Trek	WP
LCI PRIV 00749 – LCI PRIV 00750	8/2004	Sidney R. Bluming			Confidential memorandum containing attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek	WP
LCI PRIV 00751	8/11/04	Sidney R. Bluming	Greg LeMond		Confidential letter communication from attorney to client for the purpose of rendering legal advice regarding negotiations with Trek	AC/WP
LCI PRIV 00752	9/22/04	Sidney R. Bluming			Confidential attorney notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek	WP
LCI PRIV 00753	10/18/08	Sidney R. Bluming			Confidential attorney notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek	WP
LCI PRIV 00754 – LCI PRIV 00755	10/2004	Sidney R. Bluming			Confidential attorney notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek	WP
LCI PRIV 00757	10/17/04	Greg LeMond	Sidney R. Bluming		Confidential e-mail communication from client to attorney for the purpose of obtaining legal advice regarding negotiations with Trek	AC/WP
LCI PRIV 00758 – LCI PRIV 00776	10/2004	Sidney R. Bluming			Confidential draft sublicense agreement containing attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek	WP
LCI PRIV 00777 – LCI PRIV 00784	10/2004	Sidney R. Bluming			Confidential draft first amendment containing attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek	WP
LCI PRIV 00785	10/2004	Sidney R. Bluming			Confidential attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek	WP
LCI PRIV 00786 – LCI PRIV 00788	11/12/04	Sidney R. Bluming	Martin R. Lueck Christopher W. Madel Greg LeMond		Confidential fax communication between attorneys with copy to client for the purpose of rendering legal advice regarding negotiations with Trek	AC/WP

Bates number	Date	Author	To	Copied	Privilege Description	Reason
LCI PRIV 00789 – LCI PRIV 00792	11/2004	Sidney R. Bluming			Confidential attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek	WP
LCI PRIV 00793 – LCI PRIV 00795	11/2004	Sidney R. Bluming			Confidential attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek	WP
LCI PRIV 00798 – LCI PRIV 00816	11/2004	Sidney R. Bluming			Confidential attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding litigation strategy	WP
LCI PRIV 00817 – LCI PRIV 00818	8/10/04	Sidney R. Bluming	Mary Haigh		Confidential fax communication from attorney to client's representative for the purpose of rendering legal advice regarding negotiations with Trek	AC/WP
LCI PRIV 00819 – LCI PRIV 00822	11/29/04	Sidney R. Bluming	Christopher W. Madel Greg LeMond		Confidential fax communication between attorneys with copy to client for the purpose of rendering legal advice regarding negotiations with Trek	AC/WP
LCI PRIV 00823 – LCI PRIV 00824	11/30/04	Sidney R. Bluming	Christopher W. Madel		Confidential communication between attorneys for the purpose of rendering legal advice regarding negotiations with Trek	AC/WP
LCI PRIV 00825 – LCI PRIV 00826	2/8/2005	Sidney R. Bluming			Confidential attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek	WP
LCI PRIV 00827 – LCI PRIV 00828					PRODUCED AT LCI 12154-12155	
LCI PRIV 00829	2/4/05	Sidney R. Bluming			Confidential attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek	WP
LCI PRIV 00830	1/25/05	Sidney R. Bluming			Confidential attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek	WP
LCI PRIV 00831	1/2005	Sidney R. Bluming			Confidential attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek	WP

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LCI PRIV 00834	1/12/05	Sidney R. Bluming			Confidential attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek	WP
LCI PRIV 00835 – LCI PRIV 00836	1/19/05	Sidney R. Bluming	Christopher W. Madel	Dawn Van Alstine Greg LeMond	Confidential e-mail communication between attorneys with copy to client for the purpose of rendering legal advice regarding negotiations with Trek	AC/WP
LCI PRIV 00837 – LCI PRIV 00838	1/25/05	Sidney R. Bluming			Confidential attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding litigation strategy	WP
LCI PRIV 00839 – LCI PRIV 00840	1/14/05	Sidney R. Bluming			Draft correspondence to Trek containing confidential attorney notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek	WP
LCI PRIV 00841 – LCI PRIV 00842	1/14/05	Sidney R. Bluming			Draft correspondence to Trek reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek	WP
LCI PRIV 00843 – LCI PRIV 00844	1/14/05	Sidney R. Bluming			Draft correspondence to Trek reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek	WP
LCI PRIV 00845	1/20/05	Sidney R. Bluming			Confidential attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek	WP
LCI PRIV 00847 – LCI PRIV 00849	1/12/05	Sidney R. Bluming	Greg LeMond Kathy LeMond Christopher W. Madel		Confidential fax communication from attorney to client for the purpose of rendering legal advice regarding negotiations with Trek	AC/WP
LCI PRIV 00850	1/13/05	Sidney R. Bluming			Confidential attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek	WP
LCI PRIV 00851 – LCI PRIV 00858	12/16/04	Sidney R. Bluming			Confidential attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding settlement negotiations with Trek	WP

Bates number	Date	Author	To	Copied	Privilege Description	Reason
LCI PRIV 00861 – LCI PRIV 00862	12/2004	Sidney R. Bluming			Confidential attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek	WP
LCI PRIV 00865 – LCI PRIV 00866	12/9/04	Christopher W. Madel	Sidney R. Bluming Greg LeMond	Dawn Van Alstine	Confidential e-mail communication between attorneys with copy to client for the purpose of rendering legal advice regarding litigation strategy	AC/WP
LCI PRIV 00867	12/2004	Sidney R. Bluming			Confidential attorney's notes reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding negotiations with Trek	WP
LCI PRIV 00869	9/3/04	Sidney R. Bluming	Greg LeMond	Martin R. Lueck	Confidential e-mail communication from attorney to client for the purpose of rendering legal advice regarding negotiations with Trek	AC/WP
LCI PRIV 00870 – LCI PRIV 00871	9/2004	Sidney R. Bluming	Greg LeMond		Confidential memorandum from attorney to client reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice regarding in anticipation of negotiations with Trek	WP
LCI PRIV 00872 – LCI PRIV 00873	9/9/04	Mary Haigh	Sidney R. Bluming		Confidential letter communication from client's representative to attorney for the purpose of obtaining legal advice regarding royalties	AC/WP
LCI PRIV 00874 – LCI PRIV 00889	12/6/04	Sidney R. Bluming			Confidential draft litigation strategy reflecting attorney's thoughts, mental impressions, legal opinions, and legal advice	WP
LCI PRIV 00890	11/16/02	Mary Haigh	Sidney R. Bluming		Confidential fax communication from client's representative to attorney for the purpose of obtaining legal advice regarding Litscher v. Trek, LeMond et al. suit	AC/WP
LCI PRIV 00891	12/12/07	Bernie Boglioli	Greg LeMond		Confidential e-mail communication between client and client's agent regarding investigation into inventory levels done in anticipation of litigation	
LCI PRIV 00891 – LCI PRIV 00892	12/12/07	Greg LeMond	Bernie Boglioli		Confidential e-mail communication between client and client's agent regarding investigation into inventory levels done in anticipation of litigation and at the request of attorneys.	WP
LCI PRIV 00893					PRODUCED AT LCI 12156	WP
LCI PRIV 00894 – LCI PRIV 00895	09/12/08	Greg LeMond	Greg LeMond		Confidential e-mail communication of client investigation at the direction of attorney to identify potential witnesses	WP

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LCI PRIV 00896	09/29/08	Seth Wolins	Greg LeMond		Confidential e-mail communication between client and potential witness, regarding investigation of Trek prepared and obtained to assist with litigation and done at the direction of attorneys.	WP
LCI PRIV 00896 - LCI PRIV 00897	09/29/08	Andrew Carlson	Seth Wolins		Confidential e-mail communication between person acting on behalf of client and potential witness, regarding investigation of Trek prepared and obtained to assist with litigation and done at the direction of attorneys.	WP
LCI PRIV 00898	09/19/08	Joe Reenock	Greg and Kathryn LeMond	Amy Goldsmith Marisol Lopez- DaRosso	Confidential e-mail communication between attorney's agent and client with copy to attorney and paralegal regarding legal advice about Trademark registration.	AC/WP
LCI PRIV 00899	09/19/08	Joe Reenock	Greg and Kathryn LeMond	Amy Goldsmith Marisol Lopez- DaRosso	Confidential e-mail communication between attorney's agent and client with copy to attorney and paralegal regarding legal advice about Trademark registration.	AC/WP
LCI PRIV 00900	09/22/08	Joe Reenock	Greg and Kathryn LeMond		Confidential e-mail communication between attorney's agent and client regarding legal advice about Trademark registration.	AC/WP
LCI PRIV 00900 - LCI PRIV 00901	09/19/08	Joe Reenock	Greg and Kathryn LeMond	Amy Goldsmith Marisol Lopez- DaRosso	Confidential e-mail communication between attorney's agent and client regarding legal advice about Trademark registration.	AC/WP
LCI PRIV 00902	09/23/08	Bernie Boglioli	Kathryn LeMond		Confidential e-mail communication between client's agent and client regarding legal advice about Trademark registration.	AC/WP
LCI PRIV 00902	09/22/08	Joe Reenock	Greg and Kathryn LeMond		Confidential e-mail communication between attorney's agent and client regarding legal advice about Trademark registration.	AC/WP
LCI PRIV 00902 - LCI PRIV 00903	09/19/08	Joe Reenock	Greg and Kathryn LeMond	Amy Goldsmith Marisol Lopez- DaRosso	Confidential e-mail communication between attorney's agent and client regarding legal advice about Trademark registration.	AC/WP
LCI PRIV 00904 - LCI PRIV 00905	09/23/08	Joe Reenock (via teas@uspto.gov)	Greg and Kathryn LeMond	Joe Reenock	Confidential e-mail communication between attorney's agent and client with copy to attorney's agent regarding legal advice about Trademark registration.	AC/WP
LCI PRIV 00906	09/24/08	Joe Reenock	Greg and Kathryn LeMond	Amy Goldsmith Marisol Lopez- DaRosso	Confidential e-mail communication between attorney's agent and client with copy to attorney and paralegal regarding legal advice about Trademark registration.	AC/WP

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LCI PRIV 00906	09/24/08	Greg LeMond	Joe Reenock		Confidential e-mail communication between client and attorney's agent regarding legal advice about Trademark registration.	AC/WP
LCI PRIV 00907	09/19/08	Joe Reenock	Greg and Kathryn LeMond	Amy Goldsmith Marisol Lopez-DaRosso	Confidential e-mail communication between attorney's agent and client with copy to attorney and paralegal regarding legal advice about Trademark registration.	AC/WP
LCI PRIV 00908	09/24/08	Bernie Boglioli	Greg LeMond		Confidential e-mail communication between client's agent and client regarding legal advice about Trademark registration.	AC/WP
LCI PRIV 00908	09/23/08	George Rondeau Jr.	Bernie Boglioli		Confidential e-mail communication between attorney's agent and client regarding legal advice about Trademark registration.	AC/WP
LCI PRIV 00908	09/22/08	Bernie Boglioli	George Rondeau Jr		Confidential e-mail communication between attorney's agent and client regarding legal advice about Trademark registration.	AC/WP
LCI PRIV 00908 - LCI PRIV 00909	09/22/08	Kathryn LeMond	Bernie Boglioli		Confidential e-mail communication between attorney's agent and client regarding legal advice about Trademark registration.	AC/WP
LCI PRIV 00909	09/22/08	Joe Reenock	Greg and Kathryn LeMond		Confidential e-mail communication between attorney's agent and client regarding legal advice about Trademark registration.	AC/WP
LCI PRIV 00909 - LCI PRIV 00910	09/19/08	Joe Reenock	Greg and Kathryn LeMond	Amy Goldsmith Marisol Lopez-DaRosso	Confidential e-mail communication between attorney's agent and client with copy to attorney and paralegal regarding legal advice about Trademark registration.	AC/WP
LCI PRIV 00911 - LCI PRIV 00911a	08/27/08	Sidney Bluming	Greg LeMond	Denise Rahne	Confidential e-mail communication between attorney and client with copy to attorney regarding legal advice about Trademark assignments and attaching copy of confidential communication regarding same.	AC/WP
LCI PRIV 00911 - LCI PRIV 00911a	08/27/08	Sidney Bluming	Amy Goldsmith	Greg LeMond Denise Rahne	Confidential e-mail communication between attorneys with copy to client regarding legal advice about Trademark assignments and attaching copy of confidential communication regarding same.	AC/WP
LCI PRIV 00912 - LCI PRIV 00913f	07/28/08	Sidney Bluming	Chris Madel	Greg LeMond Denise Rahne	Confidential e-mail communication between attorneys with copy to client and attorney regarding communication with Trek about Trademark assignments.	AC/WP
LCI PRIV 00914 - LCI PRIV 00915i					PRODUCED at LCI 12143-53	

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LCI PRIV 00916	07/23/08	Sidney Bluming	Chris Madel	Greg LeMond Denise Raine	Confidential e-mail communication between attorneys with copy to client and attorney regarding legal advice about Trademark assignments.	AC/WP
LCI PRIV 00917	06/19/08	Marisol Lopez-DaRosso	Greg LeMond	Amy Goldsmith	Confidential e-mail communication between paralegal and client with copy to attorney regarding legal advice about Trademark application.	AC/WP
LCI PRIV 00917 - LCI PRIV 00918	05/23/08	Joe Reenock	Greg LeMond Kathryn LeMond	Amy Goldsmith Marisol Lopez-DaRosso	Confidential e-mail communication between attorney's agent and client with copy to attorney and paralegal regarding legal advice about Trademark application.	AC/WP
LCI PRIV 00918	05/23/08	Greg LeMond Kathy LeMond	Joe Reenock		Confidential e-mail communication between attorney's agent and client regarding legal advice about Trademark application.	AC/WP
LCI PRIV 00919- 00920					PRODUCED AT LCI 12157-12158	AC/WP
LCI PRIV 00921 - LCI PRIV 00922					PRODUCED AT LCI 12195-12196	
LCI PRIV 00923 - LCI PRIV 00924					PRODUCED AT LCI 12197-12198	
LCI PRIV 00925 - LCI PRIV 00926					PRODUCED AT LCI 12199-12200	
LCI PRIV 00927 - LCI PRIV 00928					PRODUCED AT LCI 12201-12202	
LCI PRIV 00929 - LCI PRIV 00930					PRODUCED AT LCI 12203-12204	04/09/08
LCI PRIV 00931 - LCI PRIV 00932					PRODUCED AT LCI 12205-12206	
LCI PRIV 00933 - LCI PRIV 00934					PRODUCED AT LCI 12207-12208	
LCI PRIV 00935 - LCI PRIV 00936					PRODUCED AT LCI 12209-12210	
LCI PRIV 00937 - LCI PRIV 00938					PRODUCED AT 12211-12212	

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LCI PRIV 00939	08/15/08	Denise Rahne	Kathryn LeMond		Confidential e-mail communication between attorney and client for the purpose of rendering legal advice regarding litigation strategy.	AC/WP
LCI PRIV 00939	08/15/08	Kathryn LeMond	Denise Rahne		Confidential e-mail communication between attorney and client for the purpose of rendering legal advice regarding litigation strategy.	AC/WP
LCI PRIV 00939 – LCI PRIV 00940	08/15/08	Kerry Roberts	Greg LeMond		Confidential e-mail communication between client and potential witness, regarding investigation of Trek prepared and obtained to assist with litigation and done at the direction of attorneys.	WP
LCI PRIV 00941	04/25/08	Kathryn LeMond	Denise Rahne	Greg and Kathryn LeMond	Confidential e-mail communication from client to attorney for the purpose of obtaining legal advice regarding litigation strategy.	AC/WP
LCI PRIV 00942 – LCI PRIV 00942b	08/03/08	Greg LeMond	Kathryn LeMond		Confidential e-mail communication between clients prepared for the purpose of obtaining legal advice regarding communication with Trek and prepared at the request of counsel.	WP
LCI PRIV 00943					PRODUCED at LCI 12142	
LCI PRIV 00944	07/16/08	Sidney Bluming	Greg LeMond	Chris Madel	Confidential e-mail communication from attorney to client with copy to attorney for the purpose of rendering legal advice regarding communication with Trek about litigation strategy.	AC/WP
LCI PRIV 00945 – LCI PRIV 00946	11/12/07	Greg LeMond	Greg LeMond		Confidential e-mail communication of client investigation at the direction of counsel to assess legal claims.	WP
LCI PRIV 00947	03/25/08	Sidney Bluming	Greg LeMond	Chris Madel Denise Rahne	Confidential e-mail communication from attorney to client with copy to attorneys for the purpose of rendering legal advice regarding litigation strategy.	AC/WP
LCI PRIV 00948	03/31/08	Sidney Bluming	Chris Madel	Denise Rahne Dawn Van Alstine Greg LeMond	Confidential e-mail communication between attorneys with copy to client, attorney, and legal administrative assistant for the purpose of rendering legal advice regarding litigation strategy.	AC/WP
LCI PRIV 00948 – LCI PRIV 00949	03/28/08	Chris Madel	Sidney Bluming	Denise Rahne Dawn Van Alstine	Confidential e-mail communication between attorneys with copy to attorney and legal administrative assistant for the purpose of rendering legal advice regarding litigation strategy.	AC/WP

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LCI PRIV 00949 – LCI PRIV 00950	03/28/08	Sidney Bluming	Greg LeMond	Chris Madel Denise Rahne	Confidential e-mail communication between attorney and client with copy to attorneys for the purpose of rendering legal advice regarding litigation strategy.	AC/WP
LCI PRIV 00951 – LCI PRIV 00951d	04/04/08	Amy Goldsmith	Greg LeMond	Joe Reenock	Confidential e-mail communication from attorney to client with copy to attorney's agent regarding legal advice about Trademark registration.	AC/WP
LCI PRIV 00952	04/08/08	Sidney Bluming	Denise Rahne	Dawn Van Alstine Greg LeMond	Confidential e-mail communication between attorneys with copy to client and legal administrative assistant regarding litigation strategy.	AC/WP
LCI PRIV 00952 – LCI PRIV 00953	04/08/08	Denise Rahne	Sidney Bluming	Dawn Van Alstine	Confidential e-mail communication between attorneys with copy to legal administrative assistant regarding litigation strategy.	AC/WP
LCI PRIV 00954	04/08/08	Sidney Bluming	Greg LeMond	Denise Rahne Chris Madel	Confidential e-mail communication from attorney to client with copies to attorneys for the purpose of rendering legal advice regarding litigation strategy.	AC/WP
LCI PRIV 00955 – LCI PRIV 00955a					PRODUCED AT LCI 12213-14	
LCI PRIV 00956- 60					PRODUCED AT LCI 12215-18	
LCI PRIV 00961- 64					PRODUCED AT LCI 12220-22	
LCI PRIV 00965- 67					PRODUCED AT LCI 12224-26	
LCI PRIV 00968 – LCI PRIV 00968b	05/13/08	Sidney Bluming	Chris Madel Denise Rahne	Greg LeMond	Confidential e-mail communication between attorneys with copy to client for the purpose of rendering legal advice regarding communication with Trek, and attaching draft correspondence for the purpose of discussing litigation strategy.	AC/WP
LCI PRIV 00968a – LCI PRIV 00968b	05/13/08	Sidney Bluming	Joseph Siefkes	Greg LeMond Robert Burns	Confidential draft correspondence for the purpose of discussing litigation strategy attached to confidential email communication between attorneys reflecting attorneys' thoughts, mental impressions, legal opinions and legal advice.	WP

Bates number	Date	Author	To	Copied	Privilege Description	Reason
LCI PRIV 00969-00971a					PRODUCED AT LCI 12159 - 12162	
LCI PRIV 00972	05/14/08	Sidney Bluming	Denise Rahne	Greg LeMond Dawn Van Alstine Chris Madel	Confidential e-mail communication between attorneys with copy to client, attorney, and legal administrative assistant for the purpose of rendering legal advice regarding litigation strategy.	AC/WP
LCI PRIV 00972 - LCI PRIV 00973	05/14/08	Denise Rahne	Sidney Bluming	Greg LeMond Dawn Van Alstine Chris Madel	Confidential e-mail communication between attorneys with copy to client, attorney, and legal administrative assistant for the purpose of rendering legal advice regarding litigation strategy.	AC/WP
LCI PRIV 00973	05/13/08	Sidney Bluming	Denise Rahne	Greg LeMond Dawn Van Alstine Chris Madel	Confidential e-mail communication between attorneys with copy to client, attorney, and legal administrative assistant for the purpose of rendering legal advice regarding litigation strategy.	AC/WP
LCI PRIV 00973	05/13/08	Denise Rahne	Sidney Bluming Chris Madel	Greg LeMond Dawn Van Alstine	Confidential e-mail communication between attorneys with copy to client, attorney, and legal administrative assistant for the purpose of rendering legal advice regarding litigation strategy.	AC/WP
LCI PRIV 00974 - LCI PRIV 00975	05/13/08	Sidney Bluming	Denise Rahne	Greg LeMond Dawn Van Alstine Chris Madel	Confidential e-mail communication between attorneys with copy to client, attorney, and legal administrative assistant for the purpose of rendering legal advice regarding litigation strategy.	AC/WP
LCI PRIV 00976 - LCI PRIV 00976b					PRODUCED at LCI 12139-41	
LCI PRIV 00977 - LCI PRIV 00977c	05/19/08	Sidney Bluming	Denise Rahne	Greg LeMond Chris Madel	Confidential e-mail communication between attorneys with copy to client, attorney for the purpose of rendering legal advice regarding communication with Trek regarding royalties.	AC/WP
LCI PRIV 00978-00979					PRODUCED AT LCI 12163-12164	
LCI PRIV 00980	05/19/08	Sidney Bluming	Denise Rahne	Greg LeMond	Confidential e-mail communication between attorneys with copy to client for the purpose of rendering legal advice regarding litigation strategy.	AC/WP
LCI PRIV 00981 - LCI PRIV 00982	05/20/08	Sidney Bluming	Denise Rahne	Greg LeMond Chris Madel	Confidential e-mail communication between attorneys with copy to client and attorney for the purpose of rendering legal advice regarding litigation strategy.	AC/WP

Bates number	Date	Author	To	Copied	Privilege Description	Reason
LCI PRIV 00983	05/22/08	Joe Reenock	Greg and Kathryn LeMond	Sidney Bluming Amy Goldsmith Marisol Lopez- DaRosso	Confidential e-mail communication between attorney's agent and client with copy to attorneys and paralegal for the purpose of providing legal advice regarding Trademark registration.	AC/WP
LCI PRIV 00983 – LCI PRIV 00985	11/29/07	Amy Goldsmith	Greg LeMond	Joe Reenock	Confidential e-mail communication between attorney and client with copy to attorney's agent for the purpose of providing legal advice regarding Trademark registration.	AC/WP
LCI PRIV 00986	05/23/08	Joe Reenock	Greg and Kathryn LeMond	Amy Goldsmith Marisol Lopez- DaRosso	Confidential e-mail communication between attorney's agent and client with copy to attorney and paralegal for the purpose of providing legal advice regarding Trademark registration.	AC/WP
LCI PRIV 00986	05/22/08	Kathy LeMond	Joe Reenock		Confidential e-mail communication between attorney's agent and client for the purpose of obtaining legal advice regarding Trademark registration.	AC/WP
LCI PRIV 00986 – LCI PRIV 00987	05/22/08	Joe Reenock	Greg and Kathryn LeMond	Amy Goldsmith Marisol Lopez- DaRosso	Confidential e-mail communication between attorney's agent and client with copy to attorney and paralegal for the purpose of providing legal advice regarding Trademark registration.	AC/WP
LCI PRIV 00987 – LCI PRIV 00989	11/29/07	Amy Goldsmith	Greg LeMond	Joe Reenock	Confidential e-mail communication between attorney' and client with copy to attorney s agent for the purpose of providing legal advice regarding Trademark registration.	AC/WP
LCI PRIV 00990	05/23/08	Bernie Boglioli	Greg LeMond		Confidential e-mail communication between client's agent and client reflecting legal advice regarding Trademark registration.	AC/WP
LCI PRIV 00990 – LCI PRIV 00991	05/23/08	Greg LeMond	Bernie Boglioli		Confidential e-mail communication between client's agent and client reflecting legal advice regarding Trademark registration.	AC/WP
LCI PRIV 00991	05/22/08	Kathy LeMond	Joe Reenock		Confidential e-mail communication between attorney's agent and client for the purpose of obtaining legal advice regarding Trademark registration.	AC/WP
LCI PRIV 00991 – LCI PRIV 00992	05/22/08	Joe Reenock	Greg and Kathryn LeMond	Amy Goldsmith Marisol Lopez- DaRosso	Confidential e-mail communication between attorney's agent and client with copy to attorney and paralegal for the purpose of providing legal advice regarding Trademark registration.	AC/WP

Bates number	Date	Author	To	Copied	Privilege Description	Reason
LCI PRIV 00992 – LCI PRIV 00994	11/29/07	Amy Goldsmith	Greg LeMond	Joe Reenock	Confidential e-mail communication between attorney and client with copy to attorney's agent for the purpose of providing legal advice regarding Trademark registration.	AC/WP
LCI PRIV 00995	05/23/08	Joe Reenock	Greg and Kathryn LeMond	Amy Goldsmith Marisol Lopez-DaRosso	Confidential e-mail communication between attorney's agent and client with copy to attorney and paralegal for the purpose of providing legal advice about Trademark registration.	AC/WP
LCI PRIV 00995 – LCI PRIV 00996	05/23/08	Greg LeMond	Joe Reenock		Confidential e-mail communication between attorney's agent and client for the purpose of obtaining legal advice about Trademark registration.	AC/WP
LCI PRIV 00997	05/27/08	Amy Goldsmith	Greg and Kathryn LeMond	Marisol Lopez-DaRosso	Confidential e-mail communication between attorney and client with copy to paralegal for the purpose of providing legal advice regarding Trademark registration.	AC/WP
LCI PRIV 00997 – LCI PRIV 00998	05/23/08	Joe Reenock	Greg and Kathryn LeMond	Amy Goldsmith Marisol Lopez-DaRosso	Confidential e-mail communication between attorney's agent and client with copy to attorney and paralegal for the purpose of providing legal advice about Trademark registration.	AC/WP
LCI PRIV 00998	05/23/08	Greg LeMond	Joe Reenock		Confidential e-mail communication between attorney's agent and client for the purpose of obtaining legal advice about Trademark registration.	AC/WP
LCI PRIV 00999 – LCI PRIV 01000	05/27/08	Ed Chanin	Kathryn LeMond		Confidential e-mail communication between attorney and client for the purpose of providing legal advice regarding incorporation of Geoffrey LeMond's business.	AC/WP
LCI PRIV 00999	05/27/08	Kathryn LeMond	Ed Chanin		Confidential e-mail communication between attorney and client for the purpose of obtaining legal advice regarding incorporation of Geoffrey LeMond's business.	AC/WP
LCI PRIV 00999 – LCI PRIV 01000	05/24/08	Geoffrey LeMond	Kathryn LeMond		Confidential communication between client and son for the purpose of obtaining legal advice regarding incorporation of Geoffrey LeMond's business.	AC/WP
LCI PRIV 01001 – LCI PRIV 01001e	05/02/08	Sidney Bluming	Denise Rahne	Greg LeMond	Confidential e-mail communication between attorneys with copy to client for the purpose of providing legal advice regarding litigation strategy.	AC/WP

Bates number	Date	Author	To	Copied	Privilege Description	Reason
LCI PRIV 01002 – LCI PRIV 01003b	05/13/08	Sidney Bluming	Chris Madel Denise Rahne	Greg LeMond	Confidential e-mail communication between attorneys with copy to client for the purpose of providing legal advice regarding litigation strategy.	AC/WP
LCI PRIV 01004	05/30/08	Sidney Bluming	Denise Rahne	Kathryn LeMond Greg LeMond Colleen Dominick Chris Madel	Confidential e-mail communication between attorneys with copy to client, attorney and legal administrative assistant for the purpose of communicating litigation strategy.	AC/WP
LCI PRIV 01004 – LCI PRIV 01005	05/30/08	Denise Rahne	Greg and Kathy LeMond	Sidney Bluming Colleen Dominick Chris Madel	Confidential e-mail communication between attorney and client with copy to attorneys and legal administrative assistant for the purpose of communicating litigation strategy.	AC/WP
LCI PRIV 01006	01/17/08	Sidney Bluming	Greg LeMond		Confidential e-mail communication between attorney and client for the purpose of providing legal advice regarding a draft speaking agreement.	AC/WP
LCI PRIV 01006 – LCI PRIV 01007	01/17/08	Greg LeMond	Sidney Bluming		Confidential e-mail communication between attorney and client for the purpose of obtaining legal advice regarding a draft speaking agreement.	AC/WP
LCI PRIV 01008	03/25/08	Sidney Bluming	John Post	Greg LeMond Bernie Boglioli	Confidential e-mail communication between attorney and client's agent with copy to client and client's agent for the purpose of rendering legal advice regarding trademarks.	AC/WP
LCI PRIV 01008 – LCI PRIV 01009	03/24/08	John Post	Sidney Bluming	Greg LeMond Bernie Boglioli	Confidential e-mail communication between attorney and client's agent with copy to client and client's agent for the purpose of obtaining legal advice regarding trademarks.	AC/WP
LCI PRIV 01010	03/25/08	John Post	Sidney Bluming	Bernie Boglioli Greg LeMond	Confidential e-mail communication between client's agent and attorney with copy to client and client's agent for the purpose of obtaining legal advice regarding trademarks.	AC/WP
LCI PRIV 01010 – LCI PRIV 01011	03/24/08	Sidney Bluming	John Post	Greg LeMond Bernie Boglioli	Confidential e-mail communication between attorney and client's agent with copy to client and client's agent for the purpose of rendering legal advice regarding trademarks.	AC/WP
LCI PRIV 01010 – LCI PRIV 01011	03/25/08	John Post	Sidney Bluming	Bernie Boglioli Greg LeMond	Confidential e-mail communication between client's agent and attorney with copy to client and client's agent for the purpose of obtaining legal advice regarding trademarks.	AC/WP

Bates number	Date	Author	To	Copied	Privilege Description	Reason
LCI PRIV 01012	03/25/08	Sidney Bluming	John Post	Bernie Boglioli Greg LeMond	Confidential e-mail communication between attorney and client's agent with copy to client and client's agent for the purpose of providing legal advice regarding trademarks.	AC/WP
LCI PRIV 01012 - LCI PRIV 01013	03/25/08	John Post	Sidney Bluming	Bernie Boglioli Greg LeMond	Confidential e-mail communication between client's agent and attorney with copy to client and client's agent for the purpose of obtaining legal advice regarding trademarks.	AC/WP
LCI PRIV 01013	03/24/08	Sidney Bluming	John Post	Greg LeMond Bernie Boglioli	Confidential e-mail communication between attorney and client's agents with copy to client and client's agent for the purpose of rendering legal advice regarding trademarks.	AC/WP
LCI PRIV 01013 - LCI PRIV 01014	03/25/08	John Post	Sidney Bluming	Bernie Boglioli Greg LeMond	Confidential e-mail communication between client's agent and attorney with copy to client and client's agent for the purpose of obtaining legal advice regarding trademarks.	AC/WP
LCI PRIV 01015 - LCI PRIV 01015b	01/14/08	Anne Cushing	Greg LeMond		Confidential e-mail communication between client's agent and client regarding legal advice and draft speaking agreement.	WP
LCI PRIV 01015 - LCI PRIV 01015b	01/03/08	Greg LeMond	Anne Cushing		Confidential e-mail communication between client's agent and client regarding legal advice and draft speaking agreement.	WP
LCI PRIV 01015a - LCI PRIV 01015b	01/03/08	Steve Leins			Confidential draft speaking agreement reflecting attorneys' thoughts, mental impressions attached to e-mail communication between client's agent and client for the purpose of obtaining legal advice regarding draft speaking agreement.	WP
LCI PRIV 01016 - LCI PRIV 01017	01/21/08	Sidney Bluming	Greg LeMond	Chris Madel Bruce Manning	Confidential e-mail communication between attorney and client with copy to attorneys for the purpose of providing legal advice regarding communications with Trek about sales and marketing of the LeMond brand.	AC/WP
LCI PRIV 01018	01/23/08	Sidney Bluming	Anne Cushing	Greg LeMond Cassandra Ching	Confidential e-mail communication between attorney and client's agent with copy to client and attorney for the purpose of providing legal advice regarding attached draft speaking agreement.	AC/WP
LCI PRIV 01018 - LCI PRIV 01019	01/22/08	Anne Cushing	Sidney Bluming		Confidential e-mail communication between attorney and client's agent for the purpose of providing legal advice regarding attached draft speaking agreement.	AC/WP

Bates number	Date	Author	To	Copied	Privilege Description	Reason
LCI PRIV 01019a - LCI PRIV 01019h	1/2008	Sidney Bluming			Confidential draft speaking agreement reflecting attorney's thoughts, mental impressions, legal opinions and legal advice attached to e-mail communication between attorney and client's agent for the purpose of providing legal advice	WP
LCI PRIV 01020	01/23/08	Sidney Bluming	Anne Cushing	Greg LeMond Cassandra Ching	Confidential e-mail communication between attorney and client's agent with copy to client and attorney for the purpose of providing legal advice regarding draft speaking agreement.	AC/WP
LCI PRIV 01020 - LCI PRIV 01021	01/23/08	Cassandra Ching	Sidney Bluming		Confidential e-mail communication between attorneys for the purpose of providing legal advice regarding attached draft speaking agreement.	AC/WP
LCI PRIV 01021	01/23/08	Sidney Bluming	Anne Cushing	Cassandra Ching	Confidential e-mail communication between attorney and client's agent with copy attorney for the purpose of providing legal advice regarding attached draft speaking agreement.	AC/WP
LCI PRIV 01021 - LCI PRIV 01022	01/23/08	Anne Cushing	Sidney Bluming		Confidential e-mail communication between attorney and client's agent for the purpose of obtaining legal advice regarding attached draft speaking agreement.	AC/WP
LCI PRIV 01022 - LCI PRIV 01023h	01/22/08	Anne Cushing	Sidney Bluming		Confidential e-mail communication between attorney and client's agent for the purpose of obtaining legal advice regarding attached draft speaking agreement.	AC/WP
LCI PRIV 01023a - LCI PRIV 01023h	1/2008	Sidney Bluming			Confidential draft speaking agreement reflecting attorney's thoughts, mental impressions, legal opinions and legal advice attached to e-mail communication between attorney and client's agent for the purpose of providing legal advice	WP
LCI PRIV 01024 - 01027					PRODUCED AT LCI 12165-12177	
LCI PRIV 01028 - LCI PRIV 01029x	02/06/08	Sidney Bluming	Denise Rahne	Dawn Van Alstine Colleen Dominick Greg LeMond	Confidential e-mail communication between attorneys with copy to client and legal administrative assistants for the purpose of communicating litigation strategy.	AC/WP
LCI PRIV 01028 - LCI PRIV 01029x	02/06/08	Denise Rahne	Sidney Bluming	Dawn Van Alstine Colleen Dominick Greg LeMond	Confidential e-mail communication between attorneys with copy to client and legal administrative assistants for the purpose of communicating litigation strategy.	AC/WP

Bates number	Date	Author	To	Copied	Privilege Description	Reason
LCI PRIV 01029 - LCI PRIV 01029x	2/06/08	Denise Rahne			Confidential draft communication reflecting attorney's thoughts, mental impressions, legal opinions and legal advice attached to e-mail communication between attorneys with copy to client and legal administrative assistants for the purpose of communicating litigation strategy.	AC/WP
LCI PRIV 01030- 1031					PRODUCED AT LCI 12178-12186	
LCI PRIV 01032 - LCI PRIV 01032w	02/07/08	Greg LeMond	Greg LeMond		Confidential e-mail communication reflecting legal advice for the purpose of assessing litigation strategy at the direction of attorneys.	AC/WP
LCI PRIV 01033	02/07/08	Sidney Bluming	Denise Rahne	Chris Madel Bruce Manning Dawn Van Alstine Greg LeMond	Confidential e-mail communication between attorneys with copy to client, attorneys, and legal administrative assistant for the purpose of communicating litigation strategy.	AC/WP
LCI PRIV 01033 - LCI PRIV 01034	02/07/08	Denise Rahne	Chris Madel Bruce Manning Sidney Bluming	Dawn Van Alstine Greg LeMond	Confidential e-mail communication between attorneys with copy to client and legal administrative assistant for the purpose of communicating litigation strategy.	AC/WP
LCI PRIV 01035 - LCI PRIV 01036b	02/07/08	Sidney Bluming	Denise Rahne Chris Madel Bruce Manning	Dawn Van Alstine Greg LeMond	Confidential e-mail communication between attorneys with copy to client and legal administrative assistant for the purpose of providing legal advice regarding litigation strategy.	AC/WP
LCI PRIV 01037 - LCI PRIV 01037uu	02/12/08	Greg LeMond	Denise Rahne	Greg LeMond	Confidential e-mail communication between client and attorney with copy to client for the purposes of receiving legal advice on litigation strategy.	AC/WP
LCI PRIV 01038 - LCI PRIV 01038b	01/16/08	Sidney Bluming	Chris Madel	Greg LeMond Bruce Manning	Confidential e-mail communication between attorneys with copy to client and attorney for the purpose of providing legal advice regarding litigation strategy.	AC/WP
LCI PRIV 01039	01/16/08	Sidney Bluming	Greg LeMond	Chris Madel Bruce Manning	Confidential e-mail communication between attorney and client with copy to attorneys for the purpose of providing legal advice regarding litigation strategy.	AC/WP

Bates number	Date	Author	To	Copied	Privilege Description	Reason
LCI PRIV 01040	01/16/08	Sidney Bluming	Bruce Manning	Greg LeMond Chris Madel Denise Rahne Dawn Van Alstine	Confidential e-mail communication between attorneys with copy to client, attorneys, and legal administrative assistant for the purpose of providing legal advice regarding litigation strategy.	AC/WP
LCI PRIV 01040 - LCI PRIV 01041	01/16/08	Bruce Manning	Sidney Bluming Chris Madel	Greg LeMond Denise Rahne Dawn Van Alstine	Confidential e-mail communication between attorneys with copy to client, attorney, and legal administrative assistant for the purpose of providing legal advice regarding litigation strategy.	AC/WP
LCI PRIV 01041 - LCI PRIV 01042	01/16/08	Sidney Bluming	Chris Madel	Greg LeMond Bruce Manning	Confidential e-mail communication between attorneys with copy to client and attorneys for the purpose of providing legal advice regarding litigation strategy.	AC/WP
LCI PRIV 01043 - 01044					PRODUCED AT LCI 12187-12188	
LCI PRIV 01045 - LCI PRIV 01045ff	02/20/08	Denise Rahne	Greg LeMond	Colleen Dominick Dawn Van Alstine	Confidential e-mail communication between attorney and client with copy to legal administrative assistants for the purpose of providing legal advice regarding litigation strategy.	AC/WP
LCI PRIV 01046	02/22/08	Sidney Bluming	Anne Cushing	Greg LeMond Cassandra Ching	Confidential e-mail communication between attorney and client's agent with copy to client and attorney for the purpose of providing legal advice regarding draft speaking agreement.	AC/WP
LCI PRIV 01046 - LCI PRIV 01047	02/22/08	Anne Cushing	Sidney Bluming		Confidential e-mail communication between attorney and client's agent for the purpose of obtaining legal advice regarding draft speaking agreement.	AC/WP
LCI PRIV 01047	01/23/08	Sidney Bluming	Anne Cushing	Cassandra Ching	Confidential e-mail communication between attorney and client's agent with copy attorney for the purpose of providing legal advice regarding draft speaking agreement.	AC/WP
LCI PRIV 01047 - LCI PRIV 01048	01/23/08	Anne Cushing	Sidney Bluming		Confidential e-mail communication between attorney and client's agent for the purpose of obtaining legal advice regarding draft speaking agreement.	AC/WP
LCI PRIV 01048	01/23/08	Sidney Bluming	Anne Cushing	Greg LeMond Cassandra Ching	Confidential e-mail communication between attorney and client's agent with copy to client and attorney for the purpose of providing legal advice regarding draft speaking agreement.	AC/WP

Bates number	Date	Author	To	Copied	Privilege Description	Reason
LCI PRIV 01047 - LCI PRIV 01048	01/22/08	Anne Cushing	Sidney Bluming		Confidential e-mail communication between attorney and client's agent for the purpose of obtaining legal advice regarding draft speaking agreement.	AC/WP
LCI PRIV 01050- 01051					PRODUCED AT LCI 12189-12190	
LCI PRIV 01052- 01053					PRODUCED AT LCI 12191-12192	
LCI PRIV 01054	03/03/08	Sidney Bluming	Chris Madel	Denise Rahne Greg LeMond	Confidential e-mail communication between attorneys with copy to client and attorney for the purpose of providing legal advice regarding litigation strategy.	AC/WP
LCI PRIV 01055	03/20/08	Sidney Bluming	Denise Rahne	Greg LeMond	Confidential e-mail communication between attorneys with copy to client for the purpose of providing legal advice regarding litigation strategy.	AC/WP
LCI PRIV 01056- 01057					PRODUCED AT LCI 12193-12194	
LCI PRIV 01058	01/11/08	Sidney Bluming	Greg LeMond	Chris Madel	Confidential e-mail communication between attorney and client with copy to attorney for the purpose of providing legal advice regarding litigation strategy.	AC/WP
LCI PRIV 01059	01/03/08	Sidney Bluming	Greg LeMond		Confidential e-mail communication between attorney and client for the purpose of providing legal advice regarding litigation strategy.	AC/WP
LCI PRIV 01060	10/14/07	Sidney Bluming	Greg LeMond	Cassandra Ching	Confidential e-mail communication between attorney and client with copy to attorney for the purpose of providing legal advice regarding draft speaking engagement.	AC/WP
LCI PRIV 01061	10/05/07	Sidney Bluming	Greg LeMond		Confidential e-mail communication between attorney and client for the purpose of providing legal advice regarding Agreement with Trek and proposed speaking agreements.	AC/WP
LCI PRIV 01061 - LCI PRIV 01062	10/05/07	Greg LeMond	Sidney Bluming		Confidential e-mail communication between attorney and client for the purpose of obtaining legal advice regarding Agreement with Trek and proposed speaking agreements.	AC/WP

Bates number	Date	Author	To	Copied	Privilege Description	Reason
LCI PRIV 01063	11/29/07	Sidney Bluming	Greg LeMond	Chris Madel	Confidential e-mail communication between attorney and client with copy to attorney for the purpose of providing legal advice regarding litigation strategy.	AC/WP
LCI PRIV 01064	06/21/07	Marisol Lopez-DaRosso	Greg LeMond Marisol Lopez-DaRosso	Sid Bluming Amy Goldsmith	Confidential e-mail communication between paralegal and client with copy to attorneys for the purpose of providing legal advice regarding trademarks.	AC/WP
LCI PRIV 01064	03/28/07	Marisol Lopez-DaRosso	Greg LeMond	Sid Bluming Amy Goldsmith	Confidential e-mail communication between paralegal and client with copy to attorneys for the purpose of providing legal advice regarding trademarks.	AC/WP
LCI PRIV 01064 - LCI PRIV 01065	12/19/06	Amy Goldsmith	Greg LeMond	Marisol Lopez-DaRosso	Confidential e-mail communication between attorney and client with copy to paralegal for the purpose of providing legal advice regarding trademarks.	AC/WP
LCI PRIV 01065	10/25/06	Amy Goldsmith	Greg LeMond	Marisol Lopez-DaRosso	Confidential e-mail communication between attorney and client with copy to paralegal for the purpose of providing legal advice regarding trademarks.	AC/WP
LCI PRIV 01066 - LCI PRIV 01068	11/29/07	Amy Goldsmith	Greg LeMond	Joe Reenock	Confidential e-mail communication between attorney and client with copy to attorney's agent for the purpose of providing legal advice regarding trademark registration.	AC/WP
LCI PRIV 01069 - LCI PRIV 01071	11/29/07	Amy Goldsmith	Greg LeMond	Joe Reenock	Confidential e-mail communication between attorney and client with copy to attorney's agent for the purpose of providing legal advice regarding trademark registration.	AC/WP
LCI PRIV 01072	11/29/07	Sidney Bluming	Greg LeMond		Confidential e-mail communication between attorney and client for the purpose of providing legal advice regarding litigation strategy.	AC/WP
LCI PRIV 01073	12/03/07	Amy Goldsmith	Greg LeMond	Joe Reenock	Confidential e-mail communication between attorney and client with copy to attorney's agent for the purpose of providing legal advice regarding trademarks.	AC/WP
LCI PRIV 01074	12/04/17	Sidney Bluming	Chris Madel	Greg LeMond	Confidential e-mail communication between attorneys with copy to client for the purposes of legal advice regarding litigation strategy.	AC/WP

Bates number	Date	Author	To	Copied	Privilege Description	Reason
LCI PRIV 01075 - LCI PRIV 01075b	11/02/07	Amy Goldsmith	Greg LeMond	Sidney Bluming Althea Armstrong	Confidential e-mail communication between attorney and client with copy to attorney and attorney's agent for the purpose of providing legal advice regarding trademarks.	AC/WP
LCI PRIV 01076 - LCI PRIV 01077h	08/20/07	Sidney Bluming	Greg LeMond		Confidential e-mail communication between attorney and client for the purpose of providing legal advice regarding draft speaking engagement and litigation strategy.	AC/WP
LCI PRIV 01076 - LCI PRIV 01077	08/19/07	Greg LeMond	Sidney Bluming		Confidential e-mail communication between attorney and client for the purpose of providing legal advice regarding draft speaking engagement and litigation strategy.	AC/WP
LCI PRIV 01077a - LCI PRIV 01077d	8/2007	Sidney Bluming			Confidential draft speaking agreement reflecting attorney's thoughts, mental impressions, legal opinions and legal advice attached to e-mail communication between attorney and client's agent for the purpose of providing legal advice	WP
LCI PRIV 01077e - LCI PRIV 01077h	8/2007	Sidney Bluming			Confidential draft speaking agreement reflecting attorney's thoughts, mental impressions, legal opinions and legal advice attached to e-mail communication between attorney and client's agent for the purpose of providing legal advice	WP
LCI PRIV 01078	10/01/07	Sidney Bluming	Greg LeMond		Confidential e-mail communication between attorney and client for the purpose of providing legal advice regarding litigation strategy.	AC/WP
LCI PRIV 01079	10/01/07	Sidney Bluming	Greg LeMond		Confidential e-mail communication between attorney and client for the purpose of providing legal advice regarding litigation strategy.	AC/WP
LCI PRIV 01079 - LCI PRIV 01080	10/01/07	Greg LeMond	Sidney Bluming		Confidential e-mail communication between attorney and client for the purpose of providing legal advice regarding litigation strategy.	AC/WP
LCI PRIV 01080 - LCI PRIV 01081	10/01/07	Sidney Bluming	Greg LeMond		Confidential e-mail communication between attorney and client for the purpose of providing legal advice regarding litigation strategy.	AC/WP

Bates number	Date	Author	To	Copied	Privilege Description	Reason
LCI PRIV 01081 - LCI PRIV 01082	10/01/07	Greg LeMond	Sidney Bluming		Confidential e-mail communication between attorney and client for the purpose of providing legal advice regarding litigation strategy.	AC/WP
LCI PRIV 01083	10/01/07	Sidney Bluming	Greg LeMond		Confidential e-mail communication between attorney and client for the purpose of providing legal advice regarding litigation strategy.	AC/WP
LCI PRIV 01083 - LCI PRIV 01084	10/01/07	Greg LeMond	Sidney Bluming		Confidential e-mail communication between attorney and client for the purpose of providing legal advice regarding litigation strategy.	AC/WP
LCI PRIV 01085	06/21/07	Sidney Bluming	Greg LeMond		Confidential e-mail communication between attorney and client for the purpose of providing legal advice regarding trademarks and communications with trademark counsel.	AC/WP
LCI PRIV 01085	06/21/07	Marisol Lopez-DaRosso	Greg LeMond Marisol Lopez-DaRosso	Sid Bluming Amy Goldsmith	Confidential e-mail communication between paralegal and client with copy to attorneys for the purpose of providing legal advice regarding trademarks.	AC/WP
LCI PRIV 01085 - LCI PRIV 01086	03/28/07	Marisol Lopez-DaRosso	Greg LeMond	Sid Bluming Amy Goldsmith	Confidential e-mail communication between paralegal and client with copy to attorneys for the purpose of providing legal advice regarding trademarks.	AC/WP
LCI PRIV 01086	12/19/06	Amy Goldsmith	Greg LeMond	Marisol Lopez-DaRosso	Confidential e-mail communication between attorney and client with copy to paralegal for the purpose of providing legal advice regarding trademarks.	AC/WP
LCI PRIV 01086	11/08/06	Amy Goldsmith	Greg LeMond	Marisol Lopez-DaRosso	Confidential e-mail communication between attorney and client with copy to paralegal for the purpose of providing legal advice regarding trademarks.	AC/WP
LCI PRIV 01087	10/25/06	Amy Goldsmith	Greg LeMond	Marisol Lopez-DaRosso	Confidential e-mail communication between attorney and client with copy to paralegal for the purpose of providing legal advice regarding trademarks.	AC/WP
LCI PRIV 01088	06/25/07	Chris Madel	Greg LeMond		Confidential e-mail communication between attorney and client for the purpose of providing legal advice regarding litigation strategy.	AC/WP

Bates number	Date	Author	To	Copied	Privilege Description	Reason
LCI PRIV 01089	12/21/07	Sidney Bluming	Greg LeMond	Chris Madel Bruce Manning	Confidential e-mail communication between attorney and client with copy to attorneys for the purpose of providing legal advice regarding litigation strategy.	AC/WP

AC = Attorney Client Privilege
WP = Work Product Doctrine